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*Counsel for TransCanada Keystone Pipeline, LP  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA

INDIGENOUS ENVIRONMENTAL  
NETWORK, *et al.*,

and

NORTHERN PLAINS RESOURCE  
COUNCIL, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
STATE, *et al.*,

Federal Defendants,

and

TRANSCANADA CORPORATION, *et*  
*al.*,

Intervenor-Defendants.

CV 17-29-GF-BMM  
CV 17-31-GF-BMM

**UNOPPOSED JOINT MOTION  
FOR EXTENSION OF TIME TO  
RESPOND TO NORTHERN  
PLAINS PLAINTIFFS' MOTION  
TO ADMIT AND TO  
SUPPLEMENT THE  
ADMINISTRATIVE RECORDS**

Defendants United States Department of State (“State Department”);

Thomas A. Shannon, Jr., in his official capacity as Under Secretary of State;

United States Fish and Wildlife Service (“FWS”); James W. Kurth, in his official capacity as Acting Director of the U.S. Fish and Wildlife Service; and Ryan Keith Zinke, in his official capacity as Secretary of the Interior, and Defendant-Intervenors TransCanada Corporation, hereby jointly move the Court to extend the

deadline for response to the Northern Plains Plaintiffs' Motion to Admit and to Supplement the Administrative Records (ECF No. 142) from February 23, 2018 until March 30, 2018. In support thereof, they state as follows:

1. Plaintiffs' motion was filed on February 9, 2018. Under the Local Rules, the deadline for responses to this motion is February 23, 2018.
2. Concurrent with filing the motion, both sets of Plaintiffs filed their motions for summary judgment, supporting memorandums, and numerous standing declarations, running to hundreds of pages. The Court has also set a hearing on February 21, 2018 concerning the Northern Plains plaintiffs' earlier administrative record motion. These litigation responsibilities, along with commitments in other cases, make it very difficult to respond to Plaintiffs' second administrative record motion within the time allotted under the Local Rules.
3. Given that the Northern Plains plaintiffs' have already relied upon, in their summary judgment motion, the materials that are the subject of their second administrative record motion, there is no procedural reason the motion needs to be addressed prior to the Federal Defendants and Defendant-Intervenors filing their cross-motions for summary judgment motion. Additionally, to the extent that there is overlap between the second administrative record motion and arguments presented in plaintiffs' summary judgment motions, Federal Defendants and Defendant-Intervenor anticipate that filing a response to the second administrative

record motion concurrent with their cross-motions for summary judgment will let the parties most effectively address these issues.

4. Accordingly, Federal Defendants and Defendant-Intervenors request that the February 23, 2018 deadline be extended until March 30, 2018, the current deadline for filing their cross-motions for summary judgment.

5. On February 15 and 16, counsel for Federal Defendants and Defendant-Intervenor conferred with the other parties to the case, who do not oppose the motion.

Respectfully submitted this 16th day of February, 2018,

JEFFREY H. WOOD, Acting Assistant Attorney General  
United States Department of Justice  
Environment and Natural Resources Division

SETH M. BARSKY, Section Chief

/s/ Bridget K. McNeil

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*Counsel for TransCanada Keystone  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2018, a copy of the foregoing motion was served on all counsel of record via the Court's CM/ECF system.

*/s/ Bridget K. McNeil*  
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BRIDGET KENNEDY McNEIL  
U.S. Department of Justice